

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

MDL No. 2817
Case No. 18 C 864

This Document Relates to All Cases

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

**INDIVIDUAL AND VENDOR CLASS PLAINTIFFS’
SECOND AMENDED RULE 26(a)(1) INITIAL DISCLOSURES**

Plaintiffs Authenticom, Inc. (“Authenticom”), Motor Vehicle Software Corporation (“MVSC”), Cox Automotive, Inc. and its affiliates (“Cox Automotive”), and Loop, LLC d/b/a AutoLoop (“AutoLoop”) (collectively, the “Individual and Vendor Class Plaintiffs”) through their undersigned attorneys, provide the following amended initial disclosures in accordance with Fed. R. Civ. P. 26(a)(1).

These amended disclosures are being made on the basis of the knowledge and information reasonably available to the Individual and Vendor Class Plaintiffs at the present time. Because Individual and Vendor Class Plaintiffs’ investigation and discovery in this case are continuing, Individual and Vendor Class Plaintiffs reserve the right to clarify, amend, or supplement the information contained in these disclosures in accordance with the Federal Rules of Civil Procedure. These disclosures are made without prejudice to Individual and Vendor Class Plaintiffs’ right to introduce at any time, including at trial, any evidence that is subsequently discovered. Individual and Vendor Class Plaintiffs further reserve the right to object to Defendants’ use of the disclosures herein, in whole or in part, at any time, including at trial, on the grounds of relevancy, competency, materiality, admissibility, hearsay, or for any other reason.

a) Individuals at Authenticom:

NAME	ADDRESS/PHONE	SUBJECT MATTER
Steve Cottrell, Authenticom's owner and CEO	Contact through Authenticom's Counsel	Defendants' agreement to drive Authenticom out of the data integration market; Defendants' blocking tactics; harm caused by Defendants' actions
Joe Noth, Authenticom's controller	Contact through Authenticom's Counsel	Defendants' blocking tactics; harm caused by Defendants' actions
Brian Clements, Authenticom's Chief Operating Officer	Contact through Authenticom's Counsel	Authenticom's business model and technology; Defendants' blocking tactics
Roxane Herricks, Authenticom's Vice President of Human Resources	Contact through Authenticom's Counsel	Harm caused by Defendants' actions
Katie Wiersgalla, Authenticom's Vice President of Product Design & User Experience	Contact through Authenticom's Counsel	Authenticom's communications with Defendants; Authenticom's marketing efforts; Defendants' blocking tactics; Reynolds' whitelisting practice

b) Individuals at MVSC:

NAME	ADDRESS/PHONE	SUBJECT MATTER
Kelly Kimball, Executive Chairman	Contact through MVSC's Counsel	MVSC's business; the EVR markets in California and Illinois; MVSC's relationship with dealers; Defendants' group boycott of MVSC; the harm Defendants have caused to MVSC's business; the necessity of data access for EVR providers

NAME	ADDRESS/PHONE	SUBJECT MATTER
Don Armstrong, CEO	Contact through MVSC's Counsel	MVSC's business; the EVR markets in California and Illinois; Defendants' group boycott of MVSC; MVSC's security protocols; MVSC's relationship with dealers; the harm Defendants have caused to MVSC's business; the necessity of data access for EVR providers
Joseph Nemelka, President and COO	Contact through MVSC's Counsel	MVSC's business; the EVR markets in California and Illinois; Defendants' group boycott of MVSC; MVSC's relationship with dealers; the harm Defendants have caused to MVSC's business; the necessity of data access for EVR providers
John Brueggerman, Chief Strategy Officer	Contact through MVSC's Counsel	MVSC's business; the EVR markets in California and Illinois; MVSC's efforts to expand into new states
Napa Bulusu, Senior Manager Operations	Contact through MVSC's Counsel	MVSC's business; MVSC's security protocols; MVSC's relationship with dealers; the harm Defendants have caused to MVSC's business

c) Individuals at Cox Automotive:

NAME	ADDRESS/PHONE	SUBJECT MATTER
Brian Green, Vice President, Corporate Business Development	Contact through Cox Automotive's Counsel	Negotiations between Cox solutions and CDK; communications with dealers regarding customer experience; harm caused by CDK's and Reynolds's data access policies; data integration

3. Documents, electronically-stored information and tangible things related to Individual and Vendor Class Plaintiffs' communications and business dealings with Defendants;

4. Documents, electronically-stored information and tangible things related to Authenticom's provision of data integration services;

5. Documents, electronically-stored information and tangible things related to Authenticom's DealerVault product;

6. Documents, electronically-stored information and tangible things related to Authenticom's communications and business dealings with its dealer and vendor customers; and

7. Documents, electronically-stored information and tangible things related to the harm of Defendants' actions on Individual and Vendor Class Plaintiffs' businesses.

III. Damages Computation

The computation of damages suffered by Individual and Vendor Class Plaintiffs as a result of Defendants' actions has yet to be determined, and discovery is only just beginning in this case. Individual and Vendor Class Plaintiffs intend to seek treble damages under the Sherman Act, as well as reasonable costs and expenses incurred in this action, including expert fees and attorney's fees.

IV. Insurance Agreement

Individual and Vendor Class Plaintiffs are not aware of any applicable insurance agreement relating to the existing claims in this litigation.

Dated: April 30, 2019

Respectfully submitted,

/s/ Derek T. Ho

Derek T. Ho

**KELLOGG, HANSEN, TODD,
FIGEL & FREDERICK, P.L.L.C.**

1615 M Street, NW, Suite 400

Washington, D.C. 20036

(202) 326-7900

dho@kellogghansen.com

*Counsel for Individual and
Vendor Class Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2019, I caused a true and correct copy of the foregoing Individual and Vendor Class Plaintiffs' Second Amended Initial Disclosures to be served by email upon all counsel of record via the following e-mail listserv:

SERVICE-EXTERNAL-DMS-MDL@LISTS.KELLOGGHANSEN.COM

/s/ Derek T. Ho

Derek T. Ho